

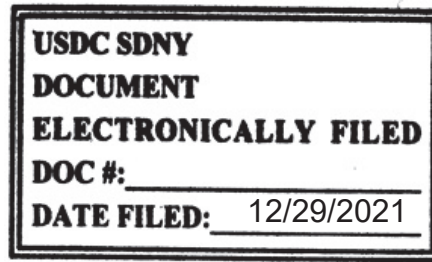
## PIERRE PIERRE LAW, P.C.

---

NEW YORK OFFICE:

211 East 43rd Street  
Suite 608  
New York, NY 10017  
Phone: (646) 992-8383  
Fax: (718) 504-6962

*\*\*\*mail all correspondence*



FLORIDA OFFICE:

1451 W Cypress Creek Road  
Suite 300  
Ft. Lauderdale, FL 33309  
Phone: (954) 884-5040  
Fax: (754) 484-3121

December 28, 2021

Honorable Robert W. Lehrburger  
United States Magistrate Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007

**Letter Motion:  
Third Extension of Time  
Request**

**Re: Anthony Ayala v. Comm'r of SSA 1:20-cv-09373-JGK (RWL)**

Dear Honorable Judge Lehrburger:

Pursuant to the Revised Scheduling Order in the above referenced case, Plaintiff's Motion for Judgment on the Pleadings is due on December 27, 2021. Plaintiff writes to respectfully request a one day extension of time to file his motion with all other dates adjusted accordingly. With the Court's approval, the revised scheduling would be as follows:

- a) Plaintiff to serve her motion on or before December 28, 2021;
- b) Defendant to serve her cross motion on or before February 26, 2022;
- c) Plaintiff to serve her Reply, if any, on or before March 19, 2022.

Plaintiff requests the Court's indulgence with this third request for an extension. Plaintiff's motion was completed in a timely manner but inadvertently never filed and counsel was out of the country on December 27, 2021. This oversight also precluded counsel from filing the instant motion two days in advance pursuant to the Court's Individual Rules. Counsel will file his motion and memorandum in support in order to allow Defendant time to prepare his motion subject to the Court's approval of the instant motion.

Defendant has been contacted and given his consent to this third request. Thank you in advance for the Court's consideration of this request.

Respectfully Submitted,

/s/Eddy Pierre Pierre

Eddy Pierre Pierre, Esq.

Attorney for Plaintiff

(646) 992-8383

(718) 504-6962 fax

Cc: Heetano Shamsoondar, Esq. (Via ECF)  
Attorney for Defendant.

SO ORDERED:

12/29/2021

A handwritten signature in black ink, appearing to be 'R. Lehrburger', written over a horizontal line.

HON. ROBERT W. LEHRBURGER  
UNITED STATES MAGISTRATE JUDGE